



AT&T South Carolina
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Columbia, SC 29201

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July 22, 2009

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's
Intervention in Numbering Resources Determinations -
Pickens Rate Center
Docket No.

Dear Mr. Terreni:

BellSouth Telecommunications Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Petition for Review of Numbering Resources Determination in the Pickens Rate Center and a Proposed Order Reversing Numbering Determination in the above-captioned matter.

By copy of this letter, I am serving a copy of these documents on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive, flowing style.

Patrick W. Turner

PWT/nml
Attachment
739755

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: AT&T SOUTH CAROLINA'S)
PETITION REQUESTING THE COMMISSION'S) Docket No. _____
INTERVENTION IN NUMBERING RESOURCES))
DETERMINATIONS)
_____)

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE PICKENS RATE CENTER

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T South Carolina"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging numbering determinations, petitions the Public Service Commission of South Carolina ("Commission") for review of a recent denial of AT&T South Carolina's application for use of numbering resources in the 864 area code. Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), depending on the nature of the numbering request. The FCC's rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading "Central office code administration,"¹ and the FCC's Orders addressing these matters allow for challenges of determinations by both entities.² Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of

¹ See, e.g., 47 C.F.R. §52.15.

² See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) ("*Third NRO Order*").

NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T South Carolina customer School District of Pickens County.

In support of this Petition, AT&T South Carolina states:

1. AT&T South Carolina is a telephone utility that provides certain services that are regulated by the Commission. Among other things, it provides intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Pickens exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”).³

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁴

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁵ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant’s rate center will be exhausted within six months of the application. The FCC reaffirmed this

³ See 47 C.F.R. § 52.13 (a), (b).

⁴ See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 (“Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.”).

⁵ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) (“*First NRO Order*”).

requirement in two subsequent orders.⁶ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. On or about July 8, 2009 AT&T South Carolina submitted a Pooling Administration System request for numbering resources. The customer requested 4,000 consecutive telephone numbers but there are no available blocks in the pool to meet this request. Due to dialing restrictions, the customer also requested that the numbering resources not contain a 0, 8 or 9 in the fourth position. In order to meet the customer's express request for numbers,⁹ AT&T South Carolina requested the assignment of a full NXX.¹⁰ As AT&T South Carolina does

⁶ See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

⁷ See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

⁸ *Third NRO Order* at ¶¶50-52.

⁹ See Exhibit A to this Petition.

¹⁰ See Exhibit B to this Petition.

not have the existing numbers to meet the customer's request, AT&T South Carolina is requesting that the numbers be assigned to it.

8. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T South Carolina filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Pickens Rate Center had a MTE of 7.684 months to 11.935 months for the relevant blocks, and a utilization of 56.033%.¹¹

10. Thereafter, also on July 8, 2009, AT&T South Carolina's request was denied because AT&T South Carolina had not met the rate center based MTE criterion now set forth in the INC Guidelines.¹² AT&T South Carolina's numbering resource requests were denied despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Pickens Rate Center.

11. AT&T South Carolina's inability to provide this important customer with the requested numbering resources prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the numbering resources needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving

¹¹ *See Id.*

¹² *See Id.*

telecommunications services of their choice from providers of their choice for want of numbering resources.”¹³

12. Both the FCC’s rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁴

13. Prior to the FCC’s Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider’s inventory did not have a block of sequential numbers large enough to meet the customer’s specific request. Under today’s procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief “if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.”¹⁵ In addition, the FCC has ruled that, “States...may grant requests for customers seeking contiguous block of numbers.”¹⁶

14. AT&T South Carolina requests that the Commission reverse the decision to withhold numbering resources from AT&T South Carolina because that decision interferes with

¹³ *Second NRO Order* at ¶ 61.

¹⁴ See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) (“The carrier may challenge the NANPA’s decision to the appropriate state regulatory commission”); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) (“Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body”).

¹⁵ *Third NRO Order* at ¶ 64.

¹⁶ *Id.*

AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.

15. This Commission (see Docket No. 2002 -185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

WHEREFORE, AT&T South Carolina requests that the Commission:

- A. Reverse the decision to deny AT&T South Carolina's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to assign an NXX in the Pickens exchange to AT&T South Carolina so it can fulfill the numbering request of its customer School District of Pickens County, and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 22nd day of July 2009.



Patrick W. Turner
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

EXHIBIT A



School District of Pickens County

Building success beyond the classroom

Monday, June 15, 2009

Michael Dempsey
Education Account Manager
for Upstate SC
AT&T Corporation

Dear Michael;

As you know the School District of Pickens County is in the process of upgrading its telecommunications system. This VoIP system is intended to have four-digit dialing to and from every telephone on the system. We will need DID for nearly every phone in the district. We want to be able to provide better access from parents to teachers. We also want these numbers to be in a single prefix so we can have a District can have a single identity. We are requesting a number block of 4000 numbers.

Please let me know if there is any additional information you need to process this request. We look forward to your response shortly.

Sincerely

A handwritten signature in black ink, which appears to read "Tim Newman".



Tim Newman
Executive Director
Accountability, Information, and Technology Services

Accountability, Information and Technology Services

415 Ann Street • Pickens, SC 29671 • P 864-878-8711 • F 864-878-8701

www.pickens.k12.sc.us

EXHIBIT B

Pooling Administration System	
 MARTA.ANTELO@ATT.COM (SP)	 Sign Out
Time : 07/08/2009 12:36:54 PM EDT	
Printable Version	
Central Office Code (NXX) Assignment Request Part 1 December 9, 2005	
Tracking Number:	864-PICKENS-SC-304097
	Full NXX: Pool Replenishment
Type of Application:	<input type="checkbox"/> New <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete
1.0 GENERAL INFORMATION	
1.1 Contact Information:	
Code Applicant:	
Company/Entity Name:	BELLSOUTH SO BELL
Headquarters Address:	2600 CAMINO RAMON
City, State, Zip:	SAN RAMON ,CA ,94583
Contact Name:	MARTA ANTELO
Contact Address:	600 NW 79TH AVENUE, ROOM 336
City,State,Zip:	MIAMI, FL, 33126
Phone:	305-260-8213
FAX:	305-264-2918
E-mail:	MARTA.ANTELO@ATT.COM
Code Administrator: ²	
Name:	Michael Ortega
Address:	46000 Center Oak Plaza
City,State,Zip:	Sterling ,VA ,20166
Phone:	571-434-5348
FAX:	571-434-5502
NXX: ³	LATA: 430 OCN: ⁴
1.2 NPA: 864 9417	Parent Company's OCN(s)
9400	
Switching Identification(Switch Entity/POI) ⁵	
PCKNSCES87E	
Locality/City/Wire Center:	Rate Center: ⁶ PICKENS
Homing Tandem Operating Co: ⁷	Tandem Homing
BST	CLLI
	⁸ :GNVLSCDT60T
1.3 Dates: Date of Application: 07/08/2009	Request Effective Date: ^{9 10} 09/12/2009

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? Yes No **X**

1.4 a) Type of company/entity requesting the code: **Incumbent**
Local Exchange Carrier (ILEC) (LEC, IC, CMRS, Other)

b) Types of service: **Wireline** (e.g., Cellular - Type 2)

Code Assignment Preference (Optional) **CUSTOMER IS REQUESTING 4000 CONSECUTIVE #'S. THERE ARE NO AVAILABLE BLOCKS IN THE POOL LIST TO MEET THEIR**

c) **DIALING RESTRICTIONS, THEREFORE, REQUESTING A FULL NXX FOR REPLENISHMENT. ALSO, DUE TO DIALING RESTRICTIONS CUSTOMER REQUESTS NO 0, 8 OR 9 IN THE 4TH POSITION (NO 864-XXX-0XXX, 864-XXX-8XXX OR 864-XXX-9XXX). 864-xxx-1, 864-xxx-2, 864-xxx-3, 864-xxx-4**

Codes that are undesirable, if any **DUE TO DIALING**
d) **RESTRICTIONS CUSTOMER REQUESTS NO 0, 8 OR 9 IN THE 4TH POSITION (NO 864-XXX-0XXX, 864-XXX-8XXX OR 864-XXX-9XXX).**

e) Type of change(Mark all that apply)

☐ OCN-Intra-company ¹¹ ☐ Switching Id ☐ Rate Center ☐
Tandem Homing CLLI

☐ OCN-Inter-company ¹² ☐ Effective Date ☐ LATA ☐
Extend Reservation

1.5 Type of Request (Initial, growth, etc.) **Growth**

If an initial code, attach(1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☐ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain):

1.8 Part 2 is attached Part 2 is not attached **X** for BIRDS ^{14 15}
Additional Documentation is attached Additional Documentation is not attached **X**

Comments:

CUSTOMER IS REQUESTING 4000 CONSECUTIVE #'S. THERE ARE NO AVAILABLE BLOCKS IN THE POOL LIST TO MEET THEIR DIALING RESTRICTIONS, THEREFORE, REQUESTING A FULL NXX FOR REPLENISHMENT. ALSO, DUE TO DIALING RESTRICTIONS CUSTOMER

REQUESTS NO 0, 8 OR 9 IN THE 4TH POSITION (NO 864-XXX-0XXX, 864-XXX-8XXX OR 864-XXX-9XXX).

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application: ¹⁶

MARTA ANTELO

**ASSOC
TECH
SUPPORT 07/08/2009
ANLYS
NTWK**

Signature of Code Applicant

Title Date

¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia TM Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia TM COMMON LANGUAGE CLLI TM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia TM Business Integrate Routing and Rating Database

System (BIRRDs) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵ WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45 calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

¹⁶ An incomplete form may result in delays in processing this request.

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Pooling Administration System	
MARTA.ANTELO@ATT.COM (SP)	• Sign Out
Time : 07/08/2009 12:39:00 PM EDT	
Printable Version	
TBPAG Attachment 1 - March 19, 2007	
Thousands-Block Application Form - Part 1A	
Tracking Number:	864-PICKENS-SC-304097 Full NXX: Pool Replenishment
Type of Application:	<input type="checkbox"/> New <input type="checkbox"/> Change <input type="checkbox"/> Disconnect
GENERAL APPLICATION INFORMATION	
1.1 Contact Information:	
Block Applicant:	
Company Name:	BELLSOUTH SO BELL
Headquarters Address:	2600 CAMINO RAMON
City, State, Zip:	SAN RAMON, CA, 94583
Contact Name:	MARTA ANTELO
Contact Address:	600 NW 79TH AVENUE, ROOM 336
City, State, Zip:	MIAMI , FL , 33126
Phone: 305-260-8213	FAX: 305-264-2918 E-mail: MARTA.ANTELO@ATT.COM
Pooling Administrator: ⁱⁱ	
Contact Name:	Dora Wirth
Contact Address:	1800 Sutter St
City, State, Zip:	Concord ,CA,94520
Phone: 925-363-8706	FAX: 925-363-7684
E-mail: dora.wirth@neustar.com	
1.2 General Information:	
Check one : No LRN needed <input checked="" type="checkbox"/> LRN needed ⁱⁱⁱ	
NPA: 864 LATA: 430 OCN: ^{iv} 9417 Parent Company's OCN 9400	
Number of Thousands-Blocks Requested : 4	
Switching Identification(Switch Entity/POI) : ^v	

PCKNSCES87E

City or Wire Center Name :
Rate Center Sub Zone:

Rate Center: ^{vi} **PICKENS**

1.3 Dates:

Date of Application: ^{vii}
07/08/2009

Requested Block Effective Date: ^{viii}
09/12/2009

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes No **X**

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : **Incumbent Local Exchange Carrier (ILEC)**
(LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : **Wireline**
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional)
CUSTOMER IS REQUESTING 4000 CONSECUTIVE #'S. THERE ARE NO AVAILABLE BLOCKS IN THE POOL LIST TO MEET THEIR DIALING RESTRICTIONS, THEREFORE, REQUESTING A FULL NXX FOR REPLENISHMENT. ALSO, DUE TO DIALING RESTRICTIONS CUSTOMER REQUESTS NO 0, 8 OR 9 IN THE 4TH POSITION (NO 864-XXX-0XXX, 864-XXX-8XXX OR 864-XXX-9XXX). 864-xxx-1, 864-xxx-2, 864-xxx-3, 864-xxx-4
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
DUE TO DIALING RESTRICTIONS CUSTOMER REQUESTS NO 0, 8 OR 9 IN THE 4TH POSITION (NO 864-XXX-0XXX, 864-XXX-8XXX OR 864-XXX-9XXX).
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) **N/A**

1.5 Type of Request:

Initial block for rate center : Yes If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes **X** If Yes , attach months to exhaust worksheet

☐ By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark all that apply)

☐ OCN:Intra-company ^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN:Inter-company ^x ☐ Effective Date

Change block : Yes If Yes , list NPA-NXX-X

1.6 Block Return :

- a) Is this block Contaminated Yes No
- b) If Yes how many TNs are NOT available for assignment :

- c) Have all new Intra SP ports been completed in the NPAC Yes No
 d) Has this block been protected from further assignment Yes No

Disconnect block : Yes If Yes , list NPA-NXX-X

Remarks: **CUSTOMER IS REQUESTING 4000 CONSECUTIVE #'S. THERE ARE NO AVAILABLE BLOCKS IN THE POOL LIST TO MEET THEIR DIALING RESTRICTIONS, THEREFORE, REQUESTING A FULL NXX FOR REPLENISHMENT. ALSO, DUE TO DIALING RESTRICTIONS CUSTOMER REQUESTS NO 0, 8 OR 9 IN THE 4TH POSITION (NO 864-XXX-0XXX, 864-XXX-8XXX OR 864-XXX-9XXX).**

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

MARTA ANTELO

**ASSOC
TECH
SUPPORT 07/08/2009
ANLYS
NTWK**

Signature of Block Applicant

Title Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by TelcordiaTM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in

regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes :

- ⁱ Identify the type of change(s) in Section 1.5.
- ⁱⁱ The Pool Administrator is available to assist in completing these forms.
- ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.
- ^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.
- ^{vi} Rate Center name must be a tariffed Rate Center.
- ^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- ^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.
- ^x Select if you are not the current Block Holder
- ^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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Pooling Administration System																																																			
MARTA.ANTELO@ATT.COM (SP)										• Sign Out																																									
Time : 07/08/2009 12:39:47 PM EDT																																																			
Appendix 3										Printable Version May 16, 2008																																									
MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level ¹ (Thousands-Block Number Pooling Growth Block Request)																																																			
Tracking Number: 864-PICKENS-SC-304097																																																			
Date: 07/08/2009				OCN: 9417				Company Name: BELLSOUTH SO BELL																																											
Rate Center: PICKENS																																																			
List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):																																																			
Name of Block Applicant: MARTA ANTELO																																																			
Signature: MARTA ANTELO																																																			
Title: ASSOC TECH SUPPORT ANALYS NTWK																																																			
FAX No.: 305-264-2918																																																			
E-mail: MARTA.ANTELO@ATT.COM																																																			
A. Available Numbers: 5422																																																			
B. Assigned Numbers: 8201																																																			
C. Total Numbering Resources: 14636																																																			
D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ² : 0																																																			
List Excluded Code(s) or Block(s):																																																			
<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Month #1</th> <th>Month #2</th> <th>Month #3</th> <th>Month #4</th> <th>Month #5</th> <th>Month #6</th> <th>Month #7</th> <th>Month #8</th> <th>Month #9</th> <th>Month #10</th> <th>Month #11</th> <th>Month #12</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">E. Growth History - Previous 6 months³</td> <td style="text-align: center; padding: 5px;">51</td> <td style="text-align: center; padding: 5px;">28</td> <td style="text-align: center; padding: 5px;">131</td> <td style="text-align: center; padding: 5px;">-21</td> <td style="text-align: center; padding: 5px;">18</td> <td style="text-align: center; padding: 5px;">29</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="padding: 5px;">F. Forecast - Next 12 months⁴</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">4039</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">39</td> <td style="text-align: center; padding: 5px;">39</td> </tr> </tbody> </table>														Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12	E. Growth History - Previous 6 months ³	51	28	131	-21	18	29							F. Forecast - Next 12 months ⁴	39	39	39	4039	39	39	39	39	39	39	39	39
	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12																																							
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G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 705.667																																																			

H. Months
to
Exhaust⁵
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested	Available Numbers	Months To Exhaust
1	5422	7.684
2	6422	9.101
3	7422	10.518
4	8422	11.935

I.
Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= 56.033

Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation:

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.


⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

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Pooling Administration System	
 MARTA.ANTELO@ATT.COM (SP)	Sign Out
Time : 07/08/2009 12:34:00 PM EDT	
	Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹
	Your Utilization calculates to 56.033% . The FCC required the utilization of 75.000% . You have requested more blocks than you will exhaust in six months.
	Select One Option and Submit
	<input checked="" type="radio"/> Return to the Months To Exhaust Form
	<input type="radio"/> Need to request a State Waiver
	<input type="radio"/> Received a State Waiver
	<div>Submit Cancel</div>
<div>Question? Email us © 1997-2012 NeuStar, Inc. Legal Notice</div>	

Pooling Administration System	
MARTA.ANTELO@ATT.COM (SP)	Sign Out
Time : 07/08/2009 12:40:21 PM EDT	
Printable Version	
<div style="display: flex; justify-content: space-between;"> <div> November 21, 2003 ATIS-0300066.at3 </div> <div> Attachment 3 </div> </div> <p style="text-align: center; margin: 10px 0;">Pooling Administrator's Response/Confirmation TBPAG Part 3</p> <div style="margin-top: 20px;"> <div style="display: flex; justify-content: space-between;"> <div>Tracking Number :</div> <div>864-PICKENS-SC-304097</div> </div> <div style="margin-top: 20px;"> <div style="display: flex; justify-content: space-between;"> <div>Date of Application:</div> <div>07/08/2009</div> <div>Effective Date:</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div>Date of Receipt:</div> <div>07/08/2009</div> <div>Date of Response:</div> <div>07/08/2009</div> </div> </div> <div style="margin-top: 20px;"> <div style="display: flex; justify-content: space-between;"> <div>Service Provider Name:</div> <div>BELLSOUTH SO BELL</div> </div> <div style="margin-top: 5px;"> <div style="display: flex; justify-content: space-between;"> <div>(Telcordia TM LERG TM Routing Guide) OCN:</div> <div>9417</div> </div> </div> </div> <div style="margin-top: 20px;"> NPAC SOA SPID : _____ </div> <div style="margin-top: 20px;"> <p>Pooling Administrator Contact Information:</p> <div style="display: flex; justify-content: space-between;"> <div> Dora Wirth Signature of Pooling Administrator </div> <div> Phone: 925-363-8706 Fax: 925-363-7684 </div> </div> <div style="margin-top: 10px;"> <div style="display: flex; justify-content: space-between;"> <div>Dora Wirth</div> <div>_____</div> </div> <div style="margin-top: 5px;"> Name (print) _____ Email: <u>dora.wirth@neustar.com</u> </div> </div> <div style="margin-top: 20px;"> <div style="display: flex; justify-content: space-between;"> <div> NPA-NXX or NPA-NXX-X : _____ </div> <div> Block Assigned: _____ Block Reserved : _____ Block Reservation Expiration Date : _____ Block/Code Modified : _____ Block/Code Disconnected : _____ </div> </div> <div style="margin-top: 20px;"> Block Contaminated(Yes or No) : _____ If Yes, enter the number of TNs contaminated : _____ </div> <div style="margin-top: 20px;"> <div style="display: flex; justify-content: space-between;"> <div>Switch Identification(Switch Entity/POI): ¹</div> <div>PCKNSCES87E</div> </div> <div style="margin-top: 5px;"> <div style="display: flex; justify-content: space-between;"> <div>Rate Center:</div> <div>PICKENS</div> </div> </div> <div style="margin-top: 5px;"> <div style="display: flex; justify-content: space-between;"> <div>Rate Center Sub Zone:</div> <div>_____</div> </div> </div> </div> <div style="margin-top: 20px; text-align: center;"> Form Complete, request denied. </div> </div></div></div>	

X

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands'Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request withdrawn.**Explanation:**

Assignment activity suspended by the administrator.**Explanation:**

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

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STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina (“AT&T”) and that she has caused AT&T South Carolina’s Petition for Review of Numbering Resources Determination in the Pickens Rate Center to be served by the method indicated below upon the following this July 22, 2009:

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Sr. NPA Relief Planner – Eastern Region NANPA
NeuStar – NANPA
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Longwood, FL 32779-2327
(Electronic Mail)

Ms. Kimberly Miller
Regulatory Policy Attorney
NeuStar-NANPA
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Washington, DC 20036-3328
(Electronic Mail)

Wayne Milby
Sr. NPA Relief Planner
NueStar-NANPA
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Richmond, VA 23231
(Electronic Mail)

Mr. John Manning
Director
NANPA Regional Offices
46000 Center Oak Plaza
Sterling, VA 20166
(Electronic Mail)

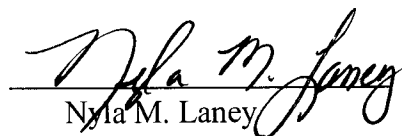
Ms. Amy Putnam
Director-Neustar National Pooling Administrator
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Concord, CA 94520
(Electronic Mail)

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Nyla M. Laney